PS Ref. No.: IBMK30291

REMARKS

This is intended as a full and complete response to the Office Action dated July 14, 2006, having a shortened statutory period for response set to expire on October 14, 2006. Please reconsider the claims pending in the application for reasons discussed below.

In the specification, the paragraphs [0054] and [0059] have been amended to correct minor editorial problems.

Claims 1-29 are pending in the application and remain pending following entry of this response.

Claim Rejections - 35 U.S.C. § 102

Claims 1-39 are rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent 7051275 by *Gupta et al.* (hereafter, "*Gupta*"). Applicants respectfully traverse this rejection.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). The elements must be arranged as required by the claim. *In re Bond*, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990).

In this case *Gupta* does not disclose "each and every element as set forth in the claim." For example, *Gupta* does not teach, show or suggest a method or interface that allows a user to specify how an annotation created for one version of a document should be applied to one or more subsequent versions of the document, as recited in the independent claims 1, 9, 14, 18, and 25.

PS Ref. No.: IBMK30291

Applicants respectfully submit that *Gupta* in fact discloses that users may not specify how an annotation created for one version of a document should be applied to subsequent versions of the document. In Column 7, line 22-26 *Gupta* states:

Thus <u>regardless</u> of the <u>number of different versions</u> of particular multimedia content available to media server 11, <u>each annotation</u> created by annotation server 10, <u>is maintained as a single copy corresponding to all of these different versions</u>.

Thus, a user is not given any choice of how an annotation created for one document should be applied to subsequent versions, as recited in the claims.

Therefore, the claims 1-29 are believed to be allowable, and allowance is respectfully requested.

Conclusion

Having addressed all issues set out in the office action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted,

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